

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

LEDCOMM LLC,

Plaintiff,

v.

THE HOME DEPOT, INC., HOME DEPOT  
U.S.A. INC.,

Defendants.

Civil Action No. 6:20-cv-00946

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR PRODUCTION OF CONFIDENTIAL AGREEMENTS**

Defendants The Home Depot, Inc., and Home Depot U.S.A. Inc. (“collectively, “Home Depot”) file this Unopposed Motion for Production of Confidential Agreements and respectfully show the following:

On January 22, 2021, by stipulation Home Depot propounded its First Set of Document Requests on plaintiff LedComm LLC (“LedComm”) which seek, *inter alia*, production of all settlement agreements and license agreements concerning the Patents-in-Suit. To facilitate this production, Home Depot hereby agrees to treat any documents received pursuant to this document request as “Confidential – Outside Attorneys’ Eyes Only” in accordance with the Court’s Interim Protective Order within the Order Governing Proceedings - Patent Case until such time as a Protective Order is entered in this case. Home Depot conferred with counsel for LedComm who stated that LedComm does not oppose this request.

WHEREFORE, Home Depot respectfully requests that the Court grant this Motion and enter an order that LedComm produce all settlement agreements and license agreements concerning the Patents-in-Suit.

Dated: February 12, 2021

Respectfully submitted,

/s/ Aaron G. Fountain

Aaron G. Fountain  
Texas Bar No. 24050619  
DLA PIPER LLP (US)  
401 Congress Avenue, Suite 2500  
Austin, TX 78701-3799  
Tel: 512.457.7125  
Fax: 512.457.7001  
aaron.fountain@dlapiper.com

Nicholas G. Papastavros (*Pro Hac Vice*)  
DLA PIPER LLP (US)  
33 Arch Street, 26th Floor  
Boston, MA 02110-1447  
Tel: 617.406.6000  
Fax: 617.406.6100  
[nick.papastavros@dlapiper.com](mailto:nick.papastavros@dlapiper.com)

Michael Burns (*Pro Hac Vice*)  
DLA PIPER LLP (US)  
One Liberty Place  
1650 Market Street, Suite 5000  
Philadelphia, PA 19103-7300  
Tel: 215.656.3300  
Fax: 215.656.3301

ATTORNEYS FOR DEFENDANTS  
THE HOME DEPOT, INC. and  
HOME DEPOT U.S.A. INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of February 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record. Any other counsel of record will be served by first class U.S. mail.

/s/ Aaron Fountain

Aaron Fountain